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8 [See signature page for the complete list
9 of parties represented. Civ. L.R. 3-4(a)(1).]

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13 COMMONWEALTH OF MASSACHUSETTS;
14 PEOPLE OF THE STATE OF CALIFORNIA ex rel.
Robert Bonta, Attorney General of California; STATE
15 OF COLORADO; STATE OF CONNECTICUT; STATE
OF DELAWARE; DISTRICT OF COLUMBIA; STATE
16 OF HAWAII; PEOPLE OF THE STATE OF ILLINOIS;
STATE OF MAINE; STATE OF MARYLAND;
17 ATTORNEY GENERAL DANA NESSEL on behalf of
the PEOPLE OF MICHIGAN; STATE OF
18 MINNESOTA by and through Attorney General Keith
Ellison; STATE OF NEVADA; STATE OF NEW
19 JERSEY; STATE OF NEW MEXICO; STATE OF NEW
YORK; STATE OF NORTH CAROLINA ex rel.
20 Attorney General Joshua H. Stein; STATE OF
OREGON; COMMONWEALTH OF
21 PENNSYLVANIA; STATE OF RHODE ISLAND;
STATE OF VERMONT; COMMONWEALTH OF
22 VIRGINIA ex rel. Attorney General Mark R. Herring;
STATE OF WISCONSIN,

23 Plaintiffs,

24 v.

25 MIGUEL CARDONA, in his official capacity as
26 Secretary of Education; and UNITED STATES
DEPARTMENT OF EDUCATION,

27 Defendants.

CASE NO. 4:20-cv-04717 SBA

**JOINT STIPULATION TO CONTINUE
THE JOINT CASE MANAGEMENT
STATEMENT AND CASE
MANAGEMENT CONFERENCE, AND
[PROPOSED] ORDER**

Current Case Management Conference
Date: May 13. 2021
Time: 2:30 pm
Place: by telephonic means
Judge: Hon. Saundra Brown Armstrong

Pursuant to Civil Local Rules 6-2(a) and 7-12, and subject to the Court's approval, the
Parties herein jointly stipulate to continue the Joint Case Management Statement due May 6, 2021
to August 5, 2021, and to continue the Case Management Conference set for May 13, 2021 to
August 12, 2021 at a time to be set by the Court. This is the fifth request to modify the schedule
in this case, and the requested modifications will not impact any other dates set by the Court. *See*
Dkt. Nos. 65, 66, 70, 73, 75, 77.

As indicated in the accompanying declaration, this extension is requested because the
Administration of President Biden believes that colleges must be held accountable if they take
advantage of students. To that end, the Department of Education, under the recently confirmed
Secretary of Education Dr. Miguel Cardona, plans to look at the borrower defense regulations and
identify ways the Department can make sure its regulations create a fair process for students to
receive relief if they have been harmed by their college. *See also* DEPARTMENT OF EDUCATION
ANNOUNCES ACTION TO STREAMLINE BORROWER DEFENSE RELIEF PROCESS (March 18, 2021),
[https://www.ed.gov/news/press-releases/department-education-announces-action-streamline-](https://www.ed.gov/news/press-releases/department-education-announces-action-streamline-borrower-defense-relief-process)
[borrower-defense-relief-process](https://www.ed.gov/news/press-releases/department-education-announces-action-streamline-borrower-defense-relief-process) ("The Department will be pursuing additional actions [addressing
borrower defense claims], including re-regulation, in the future.") This extension will allow the
Parties to evaluate how that ongoing process may impact the above captioned case.

DATED: May 3, 2021

Respectfully submitted

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** In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty
of perjury that all signatories, by and through the counsel signing on behalf of the State of
California, have concurred in the filing of this document.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

COMMONWEALTH OF MASSACHUSETTS; PEOPLE OF THE STATE OF CALIFORNIA ex rel. Robert Bonta, Attorney General of California; STATE OF COLORADO; STATE OF CONNECTICUT; STATE OF DELAWARE; DISTRICT OF COLUMBIA; STATE OF HAWAII; PEOPLE OF THE STATE OF ILLINOIS; STATE OF MAINE; STATE OF MARYLAND; ATTORNEY GENERAL DANA NESSEL on behalf of the PEOPLE OF MICHIGAN; STATE OF MINNESOTA by and through Attorney General Keith Ellison; STATE OF NEVADA; STATE OF NEW JERSEY; STATE OF NEW MEXICO; STATE OF NEW YORK; STATE OF NORTH CAROLINA ex rel. Attorney General Joshua H. Stein; STATE OF OREGON; COMMONWEALTH OF PENNSYLVANIA; STATE OF RHODE ISLAND; STATE OF VERMONT; COMMONWEALTH OF VIRGINIA ex rel. Attorney General Mark R. Herring; STATE OF WISCONSIN.

Plaintiffs,

V.

MIGUEL CARDONA, in his official capacity as Secretary of Education; and UNITED STATES DEPARTMENT OF EDUCATION,

Defendants.

PURSUANT TO STIPULATION, IT IS SO ORDERED. The Case Management Conference is continued to August 12, 2021 at _____. The Parties shall file a Joint Case Management Statement on or before August 5, 2021.

DATE:

The Honorable Saundra Brown Armstrong
United States District Judge